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THE CITY OF NEW YORK  
LAW DEPARTMENT  
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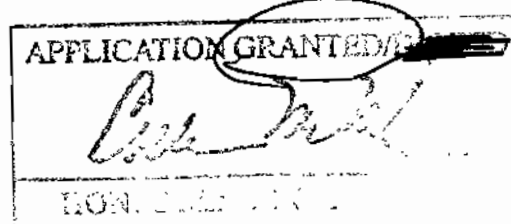
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MEMO ENDORSED

January 10, 2008

**BY FAX**

Honorable Colleen McMahon  
United States District Judge  
United States Courthouse  
Southern District of New York  
500 Pearl Street, Room 640  
New York, New York 10007



Re: Cynthia Little v. City of New York, et al.  
07 CV 11116 (CM)(DFE)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to represent defendant City of New York ("City") in this matter. I write to respectfully request an enlargement of time from January 14, 2008, until March 14, 2008, for the City to answer or otherwise respond to the complaint. Plaintiff's counsel consents to this application.

In the complaint, plaintiff alleges, *inter alia*, that on September 8, 2006, she was unlawfully detained and subjected to excessive force by members of the New York City Police Department. Plaintiff further alleges that she was required to seek medical attention for injuries she sustained during the incident.


There are several reasons for seeking an enlargement of time. First, in accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need this additional time to investigate the allegations of the complaint. Therefore, this office will be forwarding to plaintiff for execution releases for her medical records. Additionally, as the complaint indicates that plaintiff was never charged, this office will be forwarding to plaintiff for execution a consent to the designation of the Corporation Counsel as plaintiff's agent for release of records sealed pursuant to New York Criminal Procedure Law §160.50. Pursuant to that statute, all official records concerning plaintiff's arrest and/or prosecution, including police records, are sealed. This office cannot obtain these records without the designation and the

medical releases, and without the records, we cannot properly assess this case or respond to the complaint.

No previous request for an extension has been made. Accordingly, we respectfully request that the City's time to answer or otherwise respond to the complaint be extended to March 14, 2008.

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis (GH2772)  
Assistant Corporation Counsel

cc: Brett Klein, Esq. (by Fax)